

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NATIONAL COALITION ON  
BLACK CIVIC PARTICIPATION,  
MARY WINTER, GENE  
STEINBERG, NANCY HART,  
SARAH WOLFF, KAREN SLAVEN,  
KATE KENNEDY, EDA DANIEL, and  
ANDREA SFERES,

Plaintiffs,  
-and-

People of the STATE OF NEW  
YORK, by its attorney general,  
LETITIA JAMES, ATTORNEY  
GENERAL OF THE STATE OF  
NEW YORK

Plaintiff-Intervenor,

v.

JACOB WOHL, JACK BURKMAN,  
J.M. BURKMAN & ASSOCIATES,  
LLC, PROJECT 1599, MESSAGE  
COMMUNICATIONS, INC., and  
ROBERT MAHANIAN,

Defendants.

Civil Action No. 20-cv-08668-VM-OTW

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the accompanying Declaration of Randy E. Kleinman and all the Exhibits annexed thereto, the accompanying Memorandum of Law in support of Defendants' Motion for Summary Judgment, and all other pleadings and filings in this action, Defendants Jacob Wohl, Jack Burkman, J.M. Burkman & Associates LLC, and Project 1599 hereby moves the Court, before the Honorable Victor Marrero, United States District Court Judge, at the United States District Courthouse for the Southern District of New York, located at 500

Pearl Street, New York, New York 10007, at a date and time convenient for the Court, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting Defendants' Motion for Summary Judgment and dismissing all claims in this action with prejudice, together with such other relief as the Court deems just, proper and equitable.

**PLEASE TAKE FURTHER NOTICE**, that oral argument will occur on a date and a time designated by the Court.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to the Court's briefing schedule, any papers in opposition to this motion are to be served on the undersigned counsel or before August 12, 2022, and reply papers in support of this motion are to be served on or before September 19, 2022.

Dated: July 29, 2022

**GERSTMAN SCHWARTZ LLP**

By: /s/ Randy E. Kleinman  
Randy E. Kleinman  
David M. Schwartz  
1399 Franklin Avenue, Suite 200  
Garden City, New York 11530  
Telephone: (516) 880-8170  
Facsimile: (516) 880-8171  
rkleinman@gerstmanschwartz.com  
dschwartz@gerstmanschwartz.com

*Attorneys for Defendants*